

ANSELL ZARO GRIMM & AARON, P.C.

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By: James G. Aaron, Esq. (JA-0729)

Attorneys for Plaintiff Commerce Bank

In the matter of:

JOSEPH DiBLASI and KRYSTYNA
DiBLASI;

Debtors.

COMMERCE BANK, N.A.,

Plaintiff,

vs.

JOSEPH DiBLASI and KRYSTYNA
DiBLASI,

Defendants.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Case No. 07-28891
Hon. Donald H. Steckroth
Chapter 13

Adv. Pro. 08-01236

STIPULATION OF SETTLEMENT

The parties hereby agree as follows:

1. Plaintiff, Commerce Bank, shall be deemed to have a secured claim on assets of the Defendant, located at 445 David Terrace, Union, New Jersey.

2. Defendants acknowledge and withdraw the objection to the claim of the Plaintiff as set forth in the Complaint.

3. Defendants further agree to assist Plaintiff in its efforts to obtain judgment and collect the amount due from Third-Party Defendant Robert Reiss.

4. Plaintiff agrees to accept any sums paid over the amounts paid to the Chapter 13 Trustee and the unsecured creditor body as adequate protection payments.

5. Plaintiff agrees to forbear any actions against the Defendants for a period of six months from February 24, 2009.

6. Plaintiff agrees to forbear any collection actions against the Defendants for a period of six months from February 24, 2009.

7. Plaintiff further agrees that it will not object to Defendants' actions to obtain and enforce any judgment obtained by the Defendants against Third-Party Defendant Reiss.

ANSELL ZARO GRIMM & AARON
Attorneys for Plaintiff

BY: /s/ James G. Aaron
JAMES G. AARON

MIDDLEBROOKS SHAPIRO & NACHBAR
Attorneys for Defendants

BY: /s/ Stuart M. Nachbar
STUART M. NACHBAR

DATED: September 11, 2009